

Blozis
Linda J. Blozis, Volume 1v.
C.A. # 05-891 (SLR)Mellon Trust of Delaware, et al.
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1 MR. LaROSA: It's now 6:00 o'clock. Are
2 we anywhere close to being on damages and mitigation?
3 MS. WILSON: You know, we're very close
4 because this is the '03 performance, so I wanted to go
5 over that. And then there's the final written warning
6 that came a couple of months later and then there's
7 the termination that came months after that and then
8 we're onto mitigation.
9 MR. LaROSA: Okay. So how much longer do
10 you think you have on liability?
11 MS. WILSON: If we're closing up in an
12 hour, I'm not going to finish liability.
13 MR. LaROSA: You're saying you have more
14 than an hour on liability?
15 MS. WILSON: Yes.
16 MR. LaROSA: Well, I don't think this
17 deposition has been conducted in a very efficient
18 manner. The documents were not premarked and sent to
19 us for our review, so we have taken up a lot of time
20 with that.
21 We have taken an hour and 12 minutes in
22 breaks from the eight-hour day, so we have almost gone
23 the seven hours now and only got into twelve exhibits
24 and you're telling me there's still over an hour on

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1 determination.
2 MR. LaROSA: Okay. You're correct,
3 there's no obligation to premark the exhibits. The
4 obligation is to conduct the deposition in seven hours
5 and no further than seven hours without court
6 approval.
7 MS. WILSON: And we have had that
8 conversation, I believe it was yesterday, with the
9 judge and she made a ruling on that. And as I
10 understand it, if we can't work out our differences
11 with respect to it, then she has told us to go back to
12 her and make our arguments to her and she will make a
13 decision on it.
14 MR. LaROSA: Right. And she hasn't made a
15 ruling authorizing a longer-than-seven-hour
16 deposition. So we're agreeing for the purpose of the
17 day to go to 7:00 after we take a short break here,
18 but I think then we may have to be going back to the
19 judge.
20 MS. WILSON: Right. Whether we do it –
21 hopefully we can work it out. If we don't, we will go
22 back to where she left it open in terms of let's see
23 how it goes on the first day and then she will make a
24 determination subsequently if we can't agree. It

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1 liability, plus damages, plus mitigation, plus the
2 documents that have not been produced at this point.
3 I think what we should do is take a short
4 break here because you have gone for over an hour and
5 a half now and see what we can get through till 7:00
6 o'clock and then we will adjourn for the day.
7 MS. WILSON: All right. I just want to
8 put something on the record as well.
9 Obviously, I disagree with Mr. LaRosa's
10 characterization that the deposition hasn't been
11 conducted efficiently and we will leave it to the
12 judge to read the transcript and make that
13 determination.
14 As far as having premarked exhibits to
15 show to you in advance, there's no obligation in the
16 rules or elsewhere for that to occur. I have had the
17 exhibits ready with copies to give to you, Ms. Blozis
18 and copies have already been made and handed out. So
19 I feel that that's been done very efficiently. In
20 terms of marking the exhibits, it's probably been less
21 than a minute with respect to getting those marked and
22 turned over for review and testimony on it. So I
23 would object to that characterization and leave it to
24 the judge to read the transcript and make her own

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1 sounds like we're not going to be able to agree, so I
2 will be happy to go back to the judge.
3 I would be happy for her to read this
4 transcript because I feel like I've been flying
5 actually.
6 MR. LaROSA: Okay.
7 (A brief recess was taken.)
8 MS. WILSON: Mark this please.
9 (Blozis Deposition Exhibit No. 13 was
10 marked for identification.)
11 THE WITNESS: I've looked over these
12 pages.
13 BY MS. WILSON:
14 Q. Before we talk about Blozis 13, going back to
15 your testimony concerning Gilmore, Becker, Landis in
16 which you gave examples of why you felt their conduct
17 or comments were indicative of age discrimination and
18 gender discrimination, with the exception of Gilmore,
19 because I remember there's an incident that you went
20 to Rosemary about on May 1st of '03, did you go to HR
21 about any of the instances where you felt that Becker
22 or Landis was acting discriminatory?
23 A. Not that I recall.
24 Q. Let's look at Blozis 13.

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1 A. Yes.	1 in under section IV, Summary and Final Performance
2 Q. And have you seen Blozis 13 before today?	2 Rating.
3 A. Yes.	3 A. Yes.
4 Q. And Blozis 13 also includes the typewritten	4 Q. There you received a needs improvement? The
5 response by you which is at the end that's a two-page	5 third page from the back.
6 document?	6 A. You seem to be looking at something -- are you
7 A. I see that and I see my signature on the page,	7 looking at a page that has Bill's and my signature on
8 the second page.	8 it?
9 Q. And did you type that up?	9 Q. Yes. And up at the top there's a box, section
10 A. My recollection is that I did that, yes.	10 IV.
11 Q. And it's entitled Response to Manager Review	11 A. I see that it says needs improvement.
12 dated 1/27/03 which is looking at the first page of	12 Q. And that's checked off and then action needed
13 Blozis 13 where it says Date of Final Assessment	13 checked off? It's right underneath.
14 1/27/03?	14 A. Yes. I see that.
15 A. Yes.	15 Q. Did you have discussions with Mr. Becker about
16 Q. That's what you were responding to?	16 your needs improvement rating?
17 A. Yes.	17 A. I listened to Bill criticize my work.
18 Q. Before, Ms. Blozis, you had gone through in	18 Q. What do you recall him saying?
19 general terms how these performance management forms	19 A. I don't recall specifically at this time.
20 are completed.	20 Looking at the review, it probably was what's
21 Do you recall that testimony early today?	21 paraphrased in the paragraph at the middle of the page
22 A. Yes.	22 where he and I signed.
23 Q. And to your recollection was Blozis 13 done in	23 Q. Okay. Now, looking at the middle box where
24 the same manner?	24 there's information on it says, "Manager's Comments
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1 A. To my recollection, yes.	1 for Assessment Period - required if 'Action Needed'
2 Q. And in terms of the person giving you the	2 was selected on final performance rating" and then in
3 review, it was Becker, Bill Becker?	3 that box there's typewritten information.
4 A. It indicates that -- I'm looking for Bill's	4 A. That I see.
5 signature on it.	5 Q. Do you see that, where I am?
6 Q. It's the third page from the end.	6 A. Yes.
7 A. Yes. I see Bill's signature.	7 Q. If you would take a moment to review that
8 Q. Bill's signature with the 1-31-03 date and your	8 typewritten information, please.
9 signature above it with the 2-11-03 date?	9 A. (Reviewing document) This information contains
10 A. Yes.	10 a name of a client that you previously --
11 Q. Would you have sat down on 2-11-03 to discuss	11 Q. I see that.
12 it with --	12 MS. WILSON: Mr. LaRosa, if you don't mind
13 A. Sat down to discuss it?	13 for purposes of that review, if we could black out
14 Q. Yes.	14 Naomi's name.
15 A. I don't recall at this time because Bill, as I	15 MR. LaROSA: Okay.
16 said, was in transition and to my recollection I don't	16 MS. WILSON: Thank you.
17 know if we did this via phone or in person. I don't	17 THE WITNESS: I have read this item in the
18 recall at this time.	18 box.
19 Q. All right. Whether it was by phone or in	19 BY MS. WILSON:
20 person, do you think you had Blozis 13 in front of you	20 Q. And with respect to the information in the box,
21 when you were having your phone or in-person	21 did you and Mr. Becker go over that information?
22 discussion?	22 A. I don't recall specifically if he read that out
23 A. I'm not sure at this time.	23 loud to me. I recollect that we discussed these
24 Q. Now, with respect to looking at the third page	24 items.

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1 Q. And during your discussion with him, be it on
2 the phone or in person, did you express disagreement
3 with his assessment of the information that's
4 contained in the manager's comments?
5 **A. I recollect that I did. And it seems to be**
6 **substantiated by my two-page response attached**
7 **thereto.**
8 Q. So with respect to your two-page response, just
9 looking at the back, the second page of your two-page
10 response, it's dated February 11, '03. Is that when
11 you submitted it you believe?
12 **A. I recollect, yes.**
13 Q. And did you submit it to Becker?
14 **A. I can't specifically say at this time. He was**
15 **in a state of flux. I don't know if those notes were**
16 **passed to Greg Landis or they were Fed Ex'd to Bill**
17 **Becker. I'm not sure at this time.**
18 Q. I'm just looking at your two-page response and,
19 again, there's the reference to the customer name on
20 it looks like the last paragraph of your first page,
21 if we could black that out as well.
22 Do you remember having any conversations
23 with Mr. Becker or Mr. Landis about your response?
24 **A. Not specifically, other than producing it,**

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1 **have a recollection of Greg saying after Bill was**
2 **finally gone from our team that as work was being**
3 **piled on and I was trying to complete things that I**
4 **recollect Greg saying we were getting things done.**
5 Q. Do you know whether you had submitted the
6 outstanding projects list, for lack of a better way to
7 describe it, to Greg?
8 **A. I don't know if I would say I submitted it. I**
9 **don't exactly recollect, but to the best of my memory**
10 **I think there might have been a list that he and I**
11 **compiled together. I'm not sure at this time.**
12 Q. You and Greg?
13 **A. Yes, Greg Landis.**
14 Q. Do you remember compiling a list with Becker?
15 **A. No, I don't recall that.**
16 Q. Did you have any discussions with him, "him"
17 being Becker, that if a deadline was missed that
18 further corrective action will follow?
19 **A. It's stated in here, but I don't recall Bill**
20 **verbalizing that to me.**
21 Q. Do you remember Bill verbalizing to you that
22 there would be a zero tolerance standard for lack of
23 timely completion?
24 **A. Not verbalizing, no.**

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1 **signing it and securing it hopefully to my review.**
2 Q. Now, looking back at the manager's comments
3 that's in that box, it appears that there's some
4 action items that are identified there towards the
5 bottom; five lines up from the bottom, "Linda should
6 identify all outstanding projects."
7 **A. I see what you're referring to.**
8 Q. Did you do that?
9 **A. I don't recall what he's saying, what he means**
10 **by the outstanding projects specifically.**
11 Q. Do you remember putting together any
12 information about things that needed to be done or
13 assignments that are to be done and then saying when
14 they were expected or when you expected to get it
15 done?
16 **A. I recollect that I could have. I'm not sure at**
17 **this time.**
18 Q. You're not sure whether you did that at this
19 time?
20 **A. I have a vague recollection that there might**
21 **have been a list of some things and I do recall Greg**
22 **saying we're moving along with them.**
23 Q. You think that was in relationship --
24 **A. No. With the completion of some things. I do**

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1 Q. But as you were reviewing your review, you saw
2 that in there?
3 **A. I would have had read, I would have had to have**
4 **read the review in order to sign off on it.**
5 Q. Did you ever object to having a zero tolerance
6 standard for lack of timely completion of projects?
7 **A. Object to whom?**
8 Q. Object to HR, to Becker, to Landis, Gilmore.
9 **A. I don't recall a specific objection being made**
10 **other than my response.**
11 Q. Your objection is it fair to say was in your
12 response?
13 **A. I think it's specifically stated at my last**
14 **sentence, "I therefore disagree with these review**
15 **criticisms both in tone and substance."**
16 Q. Do you think your January 27th, '03 review,
17 that was for '02 performance?
18 **A. I'm not sure. I'm looking at the front of it**
19 **and it says date of prior assessment was February '02,**
20 **so I'm not sure exactly what time frame this**
21 **encompasses.**
22 Q. You're not sure sitting here today?
23 **A. I'm not sure sitting here today.**
24 Q. Now, with respect to Blozis 13 which is the

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1 January 27, '03 assessment, did you feel that this was
2 an example of age or sex discrimination?
3 **A. I'd have to say in a roundabout way, yes. I**
4 **think it was part of the greater plan to force me out**
5 **of the company.**
6 Q. And the greater plan going back to what you had
7 testified before in terms of getting the older workers
8 out?
9 **A. Yes.**
10 Q. What about gender?
11 **A. I would have to say that I believe that it**
12 **applied to gender too.**
13 Q. Do you think there was a plan of getting women
14 out?
15 **A. I think there was a plan to get me out.**
16 Q. Now, based on your testimony, Mrs. Blozis, it
17 appears that shortly after this January 27, '03 review
18 that Becker transitioned onto Philadelphia and then
19 you were reporting to Landis?
20 **A. Yes.**
21 Q. Did you have any other, after Becker
22 transitioned to Philadelphia did you have any other
23 reporting responsibilities to him?
24 **A. Not that I recollect at this time.**

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1 **and I don't recollect if he was sure at that time**
2 **himself.**
3 Q. Now, around I guess say the February '03 time
4 frame would it be fair to say that's when you started
5 reporting to Greg?
6 **A. As I recall, yes.**
7 Q. Now, did Greg have -- let me just change this
8 so I can give you some dates here.
9 I believe you received your final written
10 warning for performance that's dated May 19, 2003?
11 **A. I'm not sure of the exact date, but...**
12 Q. Let's get it.
13 (Blozis Deposition Exhibit No. 14 was
14 marked for identification.)
15 THE WITNESS: I have Blozis 14 in hand.
16 BY MS. WILSON:
17 Q. If you would take a look at it, please.
18 **A. (Reviewing document) I've read it.**
19 Q. Now, it has a May 19, '03 date on it up at the
20 upper left-hand side?
21 **A. Yes.**
22 Q. And then down at the bottom under copy
23 received, is that your signature?
24 **A. Yes.**

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1 Q. So it was Landis from then on?
2 **A. (The witness nodded.)**
3 Q. Is that right?
4 **A. As I recollect, it was Landis. But I remember**
5 **a specific time where I wasn't sure who was going to**
6 **do my next review.**
7 Q. In terms of whether it would be Becker or
8 Landis?
9 **A. In terms of whether it was left up to Greg at**
10 **that point in time.**
11 Q. When you say your next review, when was that
12 coming around?
13 **A. I have no specific recollection of when that**
14 **was scheduled.**
15 Q. Was it done on a yearly basis?
16 **A. In Mellon it was typically to be done, but that**
17 **was not always the case as I recall.**
18 Q. Sometimes it wouldn't be done on an annual
19 basis?
20 **A. It might stretch longer than twelve months.**
21 Q. And did you ask anybody who would be doing your
22 next review?
23 **A. I recall an incident of being in Greg's office**
24 **asking him if it were to be he to do the next review**

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1 Q. And that's your signature?
2 **A. It looks like my signature.**
3 Q. And then May 19, '03 written down, I mean by
4 your signature?
5 **A. Yes.**
6 Q. Do you think that's your handwriting as well?
7 **A. Yes, I do. I would have to say I do.**
8 Q. Between, say, February of '03 and May 19th of
9 '03, did Mr. Landis ever express to you any concerns
10 or dissatisfaction that he had with your work?
11 **A. I don't remember specifically at this time.**
12 Q. When you say you don't remember specifically at
13 this time, are you saying that he could have and you
14 don't remember or he didn't do it?
15 **A. I'm only recollecting the sheet that I**
16 **previously stated of projects to be completed and my**
17 **recollection is that we were checking those off as**
18 **completed to prompt Greg to say we're getting things**
19 **done.**
20 Q. Do you remember the date of that sheet?
21 **A. No, I don't remember the date that it was**
22 **produced.**
23 Q. Did he ever say that there were things that
24 weren't checked off that he wanted to have completed?

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1 A. I don't recall at this time.
 2 Q. What about Gilmore, did Gilmore during the
 3 period between February of '03 and May 19th of '03
 4 express any dissatisfaction with your work?
 5 A. Between -- I'm sorry. The dates?
 6 Q. February of '03 and May 19th of '03.
 7 A. That would have included the infamous April
 8 date.
 9 Q. That's right.
 10 A. And that's the only time I recollect that
 11 Brendan Gilmore was critical to the extent of
 12 unprofessionalism and ungentlemanly conduct.
 13 Q. Did you have any conversations prior to receipt
 14 of Blozis 14 with anyone that it was coming?
 15 A. I don't understand.
 16 Q. Well, did someone say, you know, prior to you
 17 actually receiving Blozis 14 did anyone say, for
 18 example, Linda, we're not seeing improvement; we're
 19 going to be issuing you a final written warning for
 20 performance?
 21 A. I don't believe anybody said anything. There
 22 was a reference to it in the review.
 23 Q. Other than the reference in the review?
 24 A. I don't recall anybody specifically saying that

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1 A. Yes, I have.
 2 Q. And have you seen Blozis 15 before today?
 3 A. This specific sheet? I recognize the
 4 similarity of a combined equity diversification for
 5 individual accounts. The numbers of these accounts I
 6 can't specifically say I recall. My only hint is what
 7 appears to be Greg's notation on the side and when
 8 that was written I'm not sure, even though it's dated.
 9 These names sound familiar.
 10 Q. Now, with respect to the handwritten notation
 11 on the side, do you recall seeing Blozis 15 with the
 12 handwritten notation on the side?
 13 A. No, I do not recall that.
 14 Q. With respect to the combined equity
 15 diversification for individuals, is that a form that
 16 you would put together as a portfolio administrator?
 17 A. It would have been a part of a portfolio
 18 booklet presentation to the clients.
 19 Q. Would that be something that you would put
 20 together?
 21 A. It would be part of some of the work that I was
 22 responsible for.
 23 Q. And with respect to the information on the form
 24 such as looking down on the left-hand side producer

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1 a final written warning was coming.
 2 Q. Did Mr. Landis ever express any concern to you
 3 that the Fox booklets hadn't been done?
 4 A. I don't recollect at this time that he did.
 5 Q. Do you recollect whether prior to May 19, '03
 6 whether the Fox booklets had been done?
 7 A. My only recollection is -- and you're referring
 8 to a client also.
 9 Q. Yes. I'm not using the full name.
 10 A. My only recollection is that the Gilmore
 11 episode in April was referring to a client booklet
 12 that I believe pertained, that I recollect pertained
 13 to the Fox account and being done all I can determine
 14 is that short of binding the information together.
 15 Q. Between the February '03 time frame and May
 16 19th, '03 time frame, did Landis or Gilmore ever
 17 complain to you about your work having to do with the
 18 Lickle account?
 19 A. I don't recall that at this time.
 20 (Blozis Deposition Exhibit No. 15 was
 21 marked for identification.)
 22 BY MS. WILSON:
 23 Q. Look at what's been marked as Blozis 15,
 24 please.

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1 goods and I guess that's services?
 2 A. Yes.
 3 Q. And there's a number 25.03?
 4 A. Yes.
 5 Q. What does that refer to?
 6 A. To the best of my recollection, it was a
 7 breakout of the performance of the account against,
 8 measured against, if I recollect correctly, the
 9 Standard & Poor's. It's the portfolios in the dark
 10 and the Standard and Poor's indices is the unshaded
 11 part.
 12 Q. And with respect to the information, I see that
 13 the dark represents portfolio and then the light
 14 Standard & Poor's and so the information would relate
 15 to whatever that bar coding is?
 16 A. It would be the percentage.
 17 Q. And do you recall having any discussions with
 18 Landis about incorrect information on the
 19 diversification form?
 20 A. No. And I don't understand this handwriting
 21 because it says, "25.03 but appears to be 6 percent"
 22 and I don't know if Greg wrote this what he exactly
 23 refers to. It seems inconsistent.
 24 Q. When you're saying the reference to the 6

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1 percent, you're not sure where that's coming from?
 2 **A. No, I'm not sure where that's coming from.**
 3 Q. You don't recall having any specific
 4 conversation with him concerning this particular form?
 5 **A. I don't recall that. The form does not look**
 6 **incorrect to me at this time.**
 7 Q. Do you recall having any conversations with
 8 Landis about incorrect information contained on the
 9 combined equity diversification for individual forms
 10 that you prepared?
 11 **A. No, I do not.**
 12 **(Blozis Deposition Exhibit No. 16 was**
 13 **marked for identification.)**
 14 THE WITNESS: I see Exhibit 16.
 15 BY MS. WILSON:
 16 Q. Have you seen Exhibit 16 before today?
 17 **A. I can't say at this time.**
 18 Q. It's the top says Investment Review?
 19 **A. Yes.**
 20 Q. Is that a document that you would run in your
 21 capacity as portfolio administrator?
 22 **A. It would have been a type of document, yes.**
 23 Q. Do you remember having any discussions with
 24 Greg Landis concerning this Blozis 16?

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1 Landis about Blozis 14?
 2 **A. I don't recall talking to Greg about it after**
 3 **it was handed to me.**
 4 Q. When he handed it to you did you read it at
 5 that point?
 6 **A. I recollect that I read it.**
 7 Q. Did he call you into his office?
 8 **A. I don't remember him -- I don't remember being**
 9 **called into his office.**
 10 Q. So you remember him handing it to you and then
 11 you read what he had handed to you?
 12 **A. To the best of my memory, I was sitting at my**
 13 **cubicle and he handed it to me and I read it and he**
 14 **walked away.**
 15 Q. When you read it, did you have any follow-up
 16 discussions with Greg Landis about it?
 17 **A. Not that I recall.**
 18 Q. And did you have any discussions with Brendan
 19 Gilmore about it?
 20 **A. Not that I recall.**
 21 Q. Now, looking at the substance of Blozis 14 in
 22 which there's a couple of bullet points that are
 23 highlighted?
 24 **A. Yes.**

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1 **A. No, I do not recollect.**
 2 Q. Do you remember having any discussions in
 3 general with Greg Landis about inaccurate or
 4 incomplete information being placed on the investment
 5 review forms in general?
 6 **A. Inaccurate or?**
 7 Q. Incomplete.
 8 **A. Incomplete? No. My recollection is that these**
 9 **were produced with the data that was supplied.**
 10 **Oftentimes the officers would say that they in a**
 11 **particular instance in a client presentation would**
 12 **want additional or less information provided than**
 13 **maybe a previous presentation done.**
 14 Q. Did Landis ever tell you that he preferred to
 15 have more information provided in his presentations?
 16 **A. I don't recollect specifically. He could have.**
 17 Q. Now, going to Blozis 14, which is your final
 18 written warning.
 19 **A. Yes.**
 20 Q. Did someone give it to you?
 21 **A. To the best of my recollection, I think it was**
 22 **handed to me by Greg Landis even though it was signed**
 23 **by Brendan Gilmore.**
 24 Q. Right. Did you have any discussions with Greg

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1 Q. Did you feel that those items were accurate?
 2 **A. I don't recollect that I felt that they were.**
 3 **I felt that it was already predetermined that they**
 4 **were going to get rid of me.**
 5 Q. And when you say that it was already
 6 predetermined that they were going to get rid of you,
 7 that was Gilmore and Becker and Landis?
 8 **A. Bill Becker was no longer a direct supervisor.**
 9 **I thought it remained the responsibility or it was**
 10 **under Gilmore and Landis.**
 11 Q. And is it fair to say that when you read Blozis
 12 14 that I asked you about the three bulleted point
 13 items but in general you disagreed with the assessment
 14 of your performance?
 15 **A. Yes, I did.**
 16 Q. Did you write a rebuttal to it?
 17 **A. I don't recall.**
 18 Q. Did you have any conversations with HR,
 19 Rosemary Thomas or anyone in HR about Blozis 14?
 20 **A. I don't recall at this time other than the**
 21 **conversation of my complaint against Brendan Gilmore.**
 22 Q. Now, I think that in your complaint you allege
 23 that you received Blozis 14 because you complained
 24 about Brendan Gilmore. Is that your belief?

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1 A. I recollect that's the time frame.
 2 Q. And the basis for your belief that Blozis 14
 3 was given to you because you complained is what?
 4 A. I'm sorry. I didn't hear the end of your
 5 sentence, your question.
 6 Q. Let me change it and make it a better question,
 7 if I can.
 8 Why do you think that, why do you think
 9 that you were given Blozis 14 because you complained
 10 about Gilmore?
 11 A. I don't know why Gilmore would have pushed it
 12 to that limit.
 13 Q. With respect to giving you the final written
 14 warning?
 15 A. Yes.
 16 Q. My question still was unclear.
 17 As I recall your complaint, you alleged
 18 that you were placed on final written warning for
 19 performance out of retaliation for having complained
 20 about Brendan Gilmore to Rosemary. Is that accurate?
 21 A. Yes.
 22 Q. And my question is: Why do you feel it was
 23 retaliatory conduct?
 24 A. I'm not sure at this time other than I believe

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1	I N D E X	PAGE
2 DEPONENT: LINDA J. BLOZIS	2	
3 Examination by Ms. Wilson		
4 E X H I B I T S		
5 BLOZIS DEPOSITION EXHIBITS	MARKED	
6 1 Complaint	5	
7 2 Document Bates stamp numbered P003	54	
8 3 Multipage document captioned "Performance Management Exempt Form"	67	
9 4 Document Bates stamp numbered P030	107	
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11 6 E-mail to Walter G. Peters from Linda J. Blozis dated November 19, 2002	168	
12 7 Document captioned "Automated Investment Review System"	173	
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14 9 Document captioned "Security List Of Holders"	182	
15 10 Document captioned "Asset Allocation Risk Profile Questionnaire"	185	
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17 12 E-mail to William S. Becker from Linda J. Blozis dated December 9, 2002	199	
18 13 Multipage document captioned "Performance Management Form"	217	
19 14 Document Bates stamp numbered P042	228	

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1 Brendan Gilmore may have been grossly offended by my
 2 complaint to HR and expedited his dismissal of me for
 3 that reason.
 4 Q. Why do you feel he was grossly offended by it?
 5 A. Because of his arrogant, unprofessional
 6 demeanor that was displayed in the past and at that
 7 meeting.
 8 MS. WILSON: It's 7:00.
 9 MR. LaROSA: Are we finished with this
 10 exhibit?
 11 MS. WILSON: We are.
 12 MR. LaROSA: So why don't we adjourn for
 13 the day?
 14 (Deposition adjourned at 7:00 p.m.)
 15
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3 16 Document captioned "Investment Review May 14, 2003"	234
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REPLACE THIS PAGE
WITH THE ERRATA SHEET
AFTER IT HAS BEEN
COMPLETED AND SIGNED
BY THE DEPONENT.

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1 State of Delaware)

)

2 New Castle County)

3

4 CERTIFICATE OF REPORTER

5

6 I, Kurt A. Fetzer, Registered Diplomate
7 Reporter and Notary Public, do hereby certify that
there came before me on Wednesday, July 26, 2006, the
7 deponent herein, LINDA J. BLOZIS, who was duly sworn
by me and thereafter examined by counsel for the
8 respective parties; that the questions asked of said
deponent and the answers given were taken down by me
9 in Stenotype notes and thereafter transcribed by use
of computer-aided transcription and computer printer
10 under my direction.

11 I further certify that the foregoing is a true
and correct transcript of the testimony given at said
examination of said witness.

12 I further certify that I am not counsel,
attorney, or relative of either party, or otherwise
13 interested in the event of this suit.

14

15
16
17 Kurt A. Fetzer, RDR, CRR
17 Certification No. 100-RPR
18 (Expires January 31, 2008)

19

DATED:

20

21

22

23

24

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